



Order Filed on June 7, 2021
by Clerk
U.S. Bankruptcy Court
District of New Jersey

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

RAS Citron, LLC

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Attorneys for Secured Creditor

Harold Kaplan HK0226

In Re:

Pietro O. Degrande,

Debtor.

Case No.: 19-32708-MBK

Chapter: 13

Hearing Date: June 15, 2021

Judge: Michael B. Kaplan

**AGREED ORDER RESOLVING SECURED CREDITOR'S MOTION FOR RELIEF
FROM THE AUTOMATIC STAY**

The relief set forth on the following pages, numbered two (2) through three (3), is hereby
ORDERED.

DATED: June 7, 2021

Honorable Michael B. Kaplan
United States Bankruptcy Judge

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Secured Creditor: JPMorgan Chase Bank, N.A.

Secured Creditor's Counsel: Robertson, Anschutz, Schneid, Crane & Partners PLLC

Debtors' Counsel: Andrew Thomas Archer

Property Involved ("Collateral"): 2019 Subaru Forester (VIN JF2SKAPC4KH402876)

Relief sought:

- ☒ Motion for relief from the automatic stay
- ☐ Motion to dismiss
- ☐ Motion for prospective relief to prevent imposition of automatic stay against the collateral by debtor's future bankruptcy filings

For good cause shown, it is **ORDERED** that Secured Creditor's Motion is resolved, subject to the following conditions:

1. Status of post-petition arrearages:
 - ☒ The Debtor has brought the account current subsequent to the filing of the Motion for Relief from Stay filed on May 20, 2021.
2. Debtor must cure all post-petition arrearages, as follows:
 - ☒ Beginning on June 15, 2021, regular monthly mortgage payments shall continue to be made in the amount of \$478.62.
3. Payments to the Secured Creditor shall be made to the following address(es):
 - ☒ Regular monthly payment: JPMorgan Chase Bank, N.A.
National Bankruptcy Department
P.O. Box 901032
Ft. Worth, Texas 76101-2032
 - ☒ Monthly cure payment: JPMorgan Chase Bank, N.A.
National Bankruptcy Department
P.O. Box 901032
Ft. Worth, Texas 76101-2032
4. In the event of Default:
 - ☒ Should the Debtor(s) fail to make any of the above captioned payments, or if any regular monthly payment should become more than thirty (30) days late or if Debtor(s) fails to comply with any terms of this Consent Order, counsel shall file a Certification of Default with the Court

and the court shall enter an Order granting relief from the Automatic Stay. A copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney.

■ In the event the Debtor(s) convert(s) to a Chapter 7 during the pendency of this bankruptcy case, the Debtor(s) shall cure all arrears within ten (10) days from the date of conversion in order to bring the loan contractually current. Should the Debtors fail to bring the loan contractually current, counsel shall file a Certification of Default with the Court, a copy of the Certification shall be sent to the Chapter 13 Trustee, Chapter 7 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay.

5. Award of Attorneys' Fees:

■ The Applicant is awarded attorney fees of \$350.00 and costs of \$188.00.


The fees and costs are payable:

■ Through the Chapter 13 plan.

☐ To the Secured Creditor within _____ days.

☐ Attorneys' fees are not awarded.

The undersigned hereby consent to the form and entry of the foregoing order.



Andrew Thomas Archer

Attorney for Debtor(s)

Date: 5-28-2021

/s/Harold Kaplan

Harold Kaplan

Attorney for Secured Creditor

Date: 5/28/2021